



U.S. Department of Justice

United States Attorney's Office  
Western District of Wisconsin

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Address:  
222 West Washington Avenue  
Suite 700  
Madison, Wisconsin 53703

March 20, 2019

Payal Khandhar  
Jasti & Khandhar, LLC  
2 S. Carroll Street, Suite 230  
Madison, WI 53703

Re: *United States v. Miesha Ihm*  
Case No. 18-cr-00166-wmc

Dear Ms. Khandhar:

This is the proposed plea agreement between the defendant and the United States in this case.

1. The defendant agrees to plead guilty to Count 1 of the indictment in this case. This count charges a violation of Title 21, United States Code, Sections 846 and 841(a)(1), and carries mandatory minimum penalties of five years in prison and a four-year term of supervised release, and maximum penalties of 40 years in prison, a \$5,000,000 fine, supervised release for life, and a \$100 special assessment. In addition to these maximum penalties, any violation of a supervised release term could lead to an additional term of imprisonment pursuant to 18 U.S.C. § 3583. The defendant agrees to pay the special assessment at or before sentencing. The defendant understands that the Court will enter an order pursuant to 18 U.S.C. § 3013 requiring the immediate payment of the special assessment. In an appropriate case, the defendant could be held in contempt of court and receive an additional sentence for failing to pay the special assessment as ordered by the Court.

2. The defendant acknowledges, by pleading guilty, that she is giving up the following rights: (a) to plead not guilty and to persist in that plea; (b) to a jury trial; (c) to be represented by counsel--and if necessary have the Court appoint counsel--at trial and at every other stage of the trial proceedings; (d) to confront and cross-examine adverse witnesses; (e) to be protected from compelled self-incrimination; (f) to testify

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and present evidence; and (g) to compel the attendance of witnesses.

3. The defendant understands that upon conviction, if she is not a United States citizen, she may be removed from the United States, denied citizenship, and denied future admission to the United States. The defendant nevertheless affirms that she wants to plead guilty regardless of any removal and immigration consequences that her plea may entail, even if the consequence is automatic removal from the United States.

4. The United States agrees to recommend that the Court, in computing the advisory Sentencing Guideline range, and in sentencing the defendant, give the defendant the maximum available reduction for acceptance of responsibility. This recommendation is based upon facts currently known to the United States and is contingent upon the defendant accepting responsibility according to the factors set forth in USSG § 3E1.1. The United States is free to withdraw this recommendation if the defendant has previously engaged in any conduct which is unknown to the United States and is inconsistent with acceptance of responsibility, or if she engages in any conduct between the date of this plea agreement and the sentencing hearing which is inconsistent with acceptance of responsibility. This recommendation is contingent on the defendant signing this plea letter on or before April 12, 2019.

5. The United States agrees that this guilty plea will completely resolve all possible federal criminal violations that have occurred in the Western District of Wisconsin provided that both of the following conditions are met: (a) the criminal conduct relates to the conduct described in the indictment; and (b) the criminal conduct was known to the United States as of the date of this plea agreement. This agreement not to prosecute is limited to those types of cases for which the United States Attorney's Office for the Western District of Wisconsin has exclusive decision-making authority. The defendant also understands that the United States will make its full discovery file available to the Probation Office for its use in preparing the presentence report. The United States also agrees to dismiss the remaining count in the indictment as it relates to the defendant at the time of sentencing.

6. The defendant understands that sentencing discussions are not part of the plea agreement. The defendant should not rely upon the possibility of a particular sentence based upon any sentencing discussions between defense counsel and the United States.

7. In the event of an appeal by either party, the United States reserves the right to make arguments in support of or in opposition to the sentence imposed by the Court.

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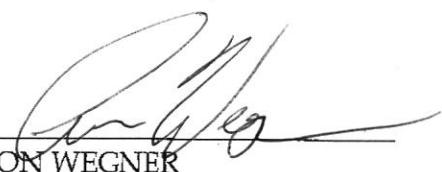
8. If your understanding of our agreement conforms with mine as set out above, please obtain the necessary signatures and return the plea letter to me. By her signature below, the defendant acknowledges her understanding that the United States has made no promises or guarantees regarding the sentence which will be imposed. The defendant also acknowledges her understanding that the Court is not required to accept any recommendations which may be made by the United States and that the Court can impose any sentence up to and including the maximum penalties set out above.

9. By your signatures below, you and the defendant also acknowledge that this is the only plea agreement in this case.


Very truly yours,


SCOTT C. BLADER  
United States Attorney

By:

  
AARON WEGNER  
Assistant United States Attorney

4-12-19  
\_\_\_\_\_  
Date

  
PAYAL KHANDHAR  
Attorney for the Defendant

  
MIESHA IHM  
Defendant

4/11/19  
\_\_\_\_\_  
Date

4/11/19  
\_\_\_\_\_  
Date